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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

BUREAU OF CONSUMER FINANCIAL
PROTECTION,

Plaintiff,

v.

PROGREXION MARKETING, INC., *et al.*,

Defendants.

Case No. 2:19-cv-00298-BSJ

**PLAINTIFF'S MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Pursuant to DUCivR 5-3 and the Modified Protective Order entered in this case (ECF 72), Plaintiff Bureau of Consumer Financial Protection (“Bureau”) moves the Court for leave to file four documents under seal:

1. Plaintiff’s Reply in Support of its Motion for Award of Monetary and Injunctive Relief, Assessment of Civil Money Penalties, and Entry of Final Judgment Against All Defendants on Count I;
2. Exhibit 2 to that reply brief, the Declaration of Camille Hinds dated May 9, 2023;
3. Plaintiff’s Evidentiary Objections to Defendants’ Response in Opposition to Plaintiff’s Motion for Relief and Judgment; and
4. Exhibit 5 to those objections, the Declaration of Trung Khanh Lam dated June 21, 2021 (with attachments).

Because these documents, or information incorporated therein, has been marked “Confidential” by the Defendants, the Bureau seeks to file them under seal to comply with the Modified Protective Order. The Bureau reserves the right to file a motion seeking to unseal some or all of these documents on grounds that the information contained therein is not properly withheld from the public.

The Bureau has filed redacted public versions of these documents on the public docket.

Dated: May 9, 2023

Respectfully submitted,

/s/ Jonathan Reischl

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CERTIFICATE OF SERVICE

I certify that on May 9, 2023, I caused the sealed version of the above-referenced documents—Plaintiff’s reply brief and Exhibit 2 thereto and Plaintiff’s evidentiary objections and Exhibit 5 thereto—to be served on all counsel of record via electronic mail. Counsel for the Defendants have previously agreed to service of such documents through these electronic means.

Dated: May 9, 2023

/s/ Jonathan Reischl
Enforcement Attorney
Bureau of Consumer Financial Protection